

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA

v.

Bobby Nelson Collins, Jr.

Defendant.

Case No. 7:17-cr-00033-EKD


MOTION TO WITHDRAW

Comes now the Defendant, Bobby Nelson Collins, Jr., by counsel, Michael P. Regan, pursuant to the Court's Order of November 14, 2017 granting in part and denying in part counsel's continuance motion, (lodged as docket 69 in this case) and as represented during counsel's call near the close of business on November 14, 2017 responsive to the direction in that Order, respectfully moves this Honorable Court for entry of an order permitting counsel to withdraw from this matter and states the following in support thereof:

Counsel is unable to comply with the time period set forth in the order for the reasons previously set forth in his Continuance Motion and further, client issues uncovered during his meetings with his client and a prosecutor on the case in Roanoke yesterday.

WHEREFORE, counsel for the Defendant respectfully moves this Court for entry of an order permitting him to withdraw as counsel of record and for the further appointment of counsel for Bobby Nelson Collins, Jr., and for whatever other and further relief the Court deems just and proper.

Bobby Nelson Collins, Jr.

  
By /s/ Michael P. Regan  
Michael P. Regan, Esq., Va. Bar #14985  
CJA Appointed  
Law Offices of Michael P. Regan  
703 Patton Street  
Danville, VA 24541  
(434) 793-9670  
(434) 793-6647 (facsimile)

## CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of November 2017, I electronically filed the foregoing Motion with the Clerk of the Court, using the CM/ECF system, which will send notification of such filing to Ashley Neese, Esq., Assistant United States Attorney, and to all other counsel of record and mailed to defendant at the Roanoke City Jail at 329 Campbell Ave S.W. Roanoke, VA 24016.

/s/ Michael P. Regan